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TO: Economic Support Supervisors
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Job Center Leads and Managers

FROM: Amy Mendel-Clemens
Communications Section
Bureau of Health Care Eligibility

BHCE/BWP OPERATIONS MEMO

No: 04-04

DATE: 02/02/2004

FS ☐ MA ☐ SC ☐ CTS ☐

CC ☒ W-2 ☐ FSET ☐

EA ☐ CF ☐ JAL ☐ JC ☐

RAP ☐ WIA ☐ WtW ☐

Other EP ☐ ★

PRIORITY: HIGH

SUBJECT: Head Start/Child Day Care Collaborations,
Provider Vacation Policy, Child Care Participant Vacation Policy

CROSS REFERENCE: Day Care Manual, chapter 3, section 1.3.2 and 10.3.0

EFFECTIVE DATE: Immediately

PURPOSE

The purpose of this memo is to inform local agency child care subsidy staff of the following:

- Clarification/expansion of the policy and definition of Head Start/child day care collaborations and how to authorize to those programs.
- New policy regarding payment to day care providers while they are on vacation.
- Clarification/expansion of the policy regarding payment of day care when parents are not in their approved activity due to time off from work (vacation or sick time).

BACKGROUND

HEAD START/CHILD DAY CARE COLLABORATIONS

The Day Care Manual, chapter 3, section 1.3.2 defines Head Start/child day care collaborations as wrap-around child care programs for children involved in Head Start activities for 4 hours or less per day. This definition has been revised due to changes in Head Start/child day care collaboration models.

In the past, most collaboration models consisted of day care staff caring for children at the Head Start location when they were not in the Head Start activity or Head Start staff coming to a day care center to provide Head Start curriculum. Day care policy supported authorizing the hours the child is in both Head Start and day care (up to the total amount of hours of care needed when the parent is in the approved activity).

Recently Head Start/child day care collaborations have expanded their models to offer Head Start and day care in the same classroom. Some models use a combination of Head Start staff and day care center staff in the same classroom. In other collaborations, the hours of the Head Start activities have expanded to more than 4 hours per day.

These new collaboration models offer opportunities for higher quality care for several reasons. The children remain in the same classroom, often with the same staff for the entire day. The day care center staff involved in these collaborations often have more early childhood education than other day care center staff because they must have the same education qualifications as Head Start teachers. Studies have shown that the more early childhood education a provider has the higher the quality of care.

The definition of Head Start/child day care collaborations has now been expanded to include current and future models. We want to encourage and support these collaborations that provide quality programs by authorizing subsidies for the hours a child needs to be in care for both Head Start and day care activities.

PROVIDER VACATION

The Child Care Section has not given any policy guidelines for making payments to providers while they have been on vacation. We have left it to agency discretion whether to make payment to hold the slot.

Recently we have been receiving an increased number of questions regarding whether payment should be made to providers who are on vacation, maternity leave, or closed for center preparation (as summer ends and school begins or vice versa in the spring). Many agencies have requested a statewide policy. It has been determined that payments may be made, within limits, depending upon the type of authorization in place.

PARENT TIME OFF FROM UNSUBSIDIZED EMPLOYMENT

Current policy in the Day Care Manual, chapter 1, section 10.3.0 indicates that a child care participant overpayment exists when a parent is absent from a W-2 approved activity without good cause, while the child was in care. The FEP determines good cause on a case by case basis.

There is confusion as to whether this policy applies to child care participants who are in approved activities other than W-2 approved activities (e.g. unsubsidized employment). This policy is being expanded to address these participants.

POLICY

HEAD START/CHILD DAY CARE COLLABORATIONS

Head Start/child day care collaborations can take on many forms. We want to support all types of collaborations by authorizing subsidy payments for the full amount of hours needed in order for parents to be in their approved activity, including the hours that a child is in a Head Start activity.

The length of the Head Start activity will vary from one Head Start/child day care collaboration to another. Child care can be authorized for both Head Start and child care hours, no matter the length of the Head Start activity. A Head Start/child day care collaboration can loosely be defined as a program that offers Head Start and day care activities to a child so that the child receives both of those activities at the same location.

Examples of Head Start/child day care collaborations include, but are not limited to:

Example 1: The Head Start site offers day care for children who need wrap-around services. The Head Start activities are in different rooms at the same location. The staff may be the same or different for both the Head Start and day care activity. The Head Start and day care activities occur from 6am – 6pm. The parent works from 8:00am-4:30pm, Monday-Friday, and needs ½ hour each way for transportation. The worker should authorize 48 hours of care per week.

Example 2: The day care center offers Head Start activities on-site. Children who attend the day care are able to access the Head Start activities. The Head Start activity may be in a different room than the day care activity. The staff may be the same or different for both the Head Start and day care activity. The day care is open from 6:30am –6:30pm and the Head Start activity is from 8am-Noon. The parent works from 7:30am -3:30pm, Monday-Friday, and needs ½ hour for travel. The worker should authorize 45 hours of care per week.

Example 3: The day care center offers a fulltime Head Start/child day care room. Children receive a blended curriculum of Head Start and day care in the same room. The staff may be a blended team of Head Start and day care center staff. The day care is open from 6am-6pm and Head Start activity is from 8am-2pm. The parent works from 9:00am – 2:00pm, Monday-Friday, and needs ½ hour for travel. The worker should authorize 30 hours of care per week.

Example 4: The Head Start site offers a fulltime Head Start/child day care room. Children receive a blended curriculum of Head Start and day care in the same room. The staff may be a blended team of Head Start and day care center staff. The Head Start classroom is open from 6am-6pm and Head Start activity is from 8am-2pm. The parent works from 8:00am -4:30pm, Monday-Wednesday, and needs ½ hour for travel. The worker should authorize 29 hours of care.

IMPORTANT NOTE ➤ Authorizations must be for the amount of hours that child care is needed for parents to remain in their approved activity. Fulltime hours should be authorized only when the parent needs fulltime care in order to be in the approved activity. Authorized hours may be for combined day care and Head Start activities.

Hours must **not** be authorized for purely Head Start activities that are not part of collaboration and thus do not offer day care activities.

PROVIDER VACATION

When a provider has indicated that their day care program will be closed and the closure will be for one week or less per year, payment will be made to that provider if the authorization type allows for such a payment (e.g. the authorization type is enrollment). The closure of the day care program can be due to the provider being on vacation, a medical reason, preparation of the center for a season change, or any other reason that the agency determines to be valid. When the authorization is based on attendance and zero hours of attendance are entered for the week, no payment will be issued for that child. When the authorization is based on enrollment and zero hours of attendance are entered for the week, payment will be issued for the weekly authorized amount.

When a provider has indicated that the day care program will be closed for more than one week in a calendar year, payment to that program must be limited to one week. (Payment would only be issued for authorizations based on enrollment.) Under this circumstance, all authorizations should be ended for any period of time that the child care program is closed in excess of one calendar week. Ending the authorizations will ensure that payment will not be issued to this provider for any time beyond the first week that the program is closed. New authorizations would be entered once the day care program reopens.

If payment was made for more than one week in a calendar year to a program that was closed, that payment is considered a child care provider overpayment and must be recovered.

If the provider charges for the time period when their day care program was closed and payment for that time period cannot be issued in accordance with this policy, the parent will be responsible for paying the provider.

This policy applies to all providers.

PARENT TIME OFF FROM UNSUBSIDIZED EMPLOYMENT

A child care participant overpayment is created when the child is in day care, but the parent is not in their approved activity for child care. The overpayment must be recovered from the parent.

The worker can grant exceptions to the overpayment if the parent did not attend their approved activity with good cause. If the approved activity is a W-2 related activity, the FEP will determine good cause. If the approved activity is a not a W-2 related activity (e.g. unsubsidized employment), the child care worker will determine good cause.

The child care worker has discretion to determine good cause when a parent has not attended their unsubsidized employment using the following guidelines:

- The parent must be allowed to drop their child at day care for the hours authorized and not incur an overpayment when they have not attended their unsubsidized employment because they are using sick time, personal time or vacation time. It is the parents' option to use authorized day care hours for the time period they are "excused" from work without penalty of an overpayment.
- The parent must continue to be employed for the period of time they are excused from work and immediately thereafter.
- If the parent is temporarily laid off or has a medical condition that prevents them from attending work but is planning on returning to work, the worker can pay to hold the slot as described in the Day Care Manual, chapter 3, section 2.9.0.

- The worker should investigate if a parent is not at work for more than one consecutive week and their child has been in care, to ensure that the parent continues to be employed and is legitimately using approved sick, personal or vacation time. If the worker has determined that good cause does not exist, the worker must determine if an overpayment was created. The overpayment must be recovered.

This policy still requires parents to only use child care when they are in an approved activity. This policy does not allow parents to use child care for non-approved activities such as errands in addition to their regular work hours. Nor does the policy allow parents to use authorized child care hours when they are not employed. The intent of the policy is to allow working parents to use authorized child care hours for legitimate employer approved time off from work without incurring an overpayment.

CONTACTS

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Note: Email contacts are preferred. Thank you.

★Program Categories – FS – Food Stamps, MA – Medicaid, SC – Senior Care, CTS – Caretaker Supplement, CC – Child Care, W-2 – Wisconsin Works, FSET – Food Stamp Employment and Training, CF – Children First, EA – Emergency Assistance, JAL – Job Access Loan, JC - Job Center Programs, RAP – Refugee Assistance Program, WtW – Welfare to Work, WIA – Wisconsin Investment Act, Other EP – Other Employment Programs.

DWD/DWS/BDS/RB